FCC 13-84

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Reassessment of Federal Communications	)	
Commission Radiofrequency Exposure Limit Policies	)	FCC Docket No. 13-84
	)	
	)	
And	)	
	)	
Proposed Changes in the Commission's Rules	)	EF Docket No. 03-137
Regarding Human Exposure to Radiofrequency	)	
Electromagnetic Fields	)	
	)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comments for FCC ET Docket No. 013-84 and EF Docket No. 03-137

Comment Filed by: Monnie Ramsell
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September 3 , 2013

Comment round for ET Docket No. 013-84 and ET Docket No. 03-137

AFFIDAVIT OF __Monnie Ramsell

State of Arizona]

Yavapai_____ County]

I, _Monnie Ramsell___, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 013-84 and ET Docket No. 03-137

My name is Monnie Ramsell . My address is 50 Bronco Drive, Sedona, AZ 86336.

I am a business owner for over fifteen years and I have a Masters Degree in Business Administration. We were aware of the issues of EMF and RF when we had interference with our computer monitors in our offices when their location were within a few feet of any electric panel. There were flickering and distortions on the monitor screen from the radiation coming out of the electrical panel. We had to shield the electric panel. We had to take great care for the placement of computers and other sensitive electronics to minimize these interferences.

Personally I have also experience sensitivity in form of headaches, loss of words when using cordless phone or cell phone held against my head. My business phone is now a regular phone on the landline. I also experience headache when I am underneath a plasma screen. I have taken great precaution to minimize my exposure to EMF and RF. If EMF and RF's frequencies could play havoc to electronics, it certain had an effect on all living beings because we are electrical beings. Our brain activities, the firing or neurons and the beating of the heart valves are all electrical activities. Businesses spend lots of money to protect their data. We all know too well that solar flares or electromagnetic storms can affect satellite and cell phone. We know too well of static electricity can wipe out data from our computer hard drives. Our cells are very delicate and are affected by non-thermal low dose of RF and EMF similar to the sensitive data on our hard drive. The frequencies of these RF signals are not conducive to life. The military knew all about it.

I have come across a letter written by Norbet Hankin, Radiation Protection Division of the United States Environmental Protection Agency replying to Janet Newton, President of The EMR Network on March 8, 2002. In the letter, Mr. Hankin addressed Ms. Newton's concerns about non-thermal effects of radiofrequency (RF) radiation and the adequacy of the Federal Communications Commission's RF radiation exposure guidelines. The Administrator had asked the EPA to critically examine issues of possible health risks, and Federal government's responsibility to protect human health.

In the letter to Ms. Newton, Mr. Hankin stated that the guidelines currently used by the FCC were adopted by the FCC in 1996. The guidelines were recommended by EPA, with certain reservations, in a letter to Thomas P. Stanley, Chief Engineer, Office of Engineering and Technology, Federal Communications Commissions, November 9, 1993, in response to the FCC's request for comments on their Notice of Proposed Rulemaking (NPRM), Guidelines for Evaluation the Environmental Effects of Radiofrequency Radiation.

The FCC's current exposure guidelines, as well as those of the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-ionizing Radiation Protection, are thermally based, and do not apply to CHRONIC, NONTHERMAL exposure situations. They are believed to protect against injury that may be cause by ACUTE exposures that result in tissue heating or electric shock and burn. The hazard level (for frequencies generally at or greater than 3 MHz) is based on a specific absorption dose-rate, SAR associated with an effect that results from an increase in body temperature. The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism but not from ALL POSSIBLE mechanisms. Therefore, the generalization by many that the guidelines protect human beings from harm by any or all mechanisms IS NOT JUSTIFIED.

These guidelines are based on findings of an adverse effect level or 4 watts per kilogram (W/kg) body weight. This SAR was observed in laboratory research involving acute exposures that elevated body temperature of animals including nonhuman primates. The

exposure guidelines DID NOT CONSIDER information that addresses NONTHERMAL, PROLONGED exposures, i.e., from research showing effects with implications for possible adversity in situations involving chronic/prolonged, low-level (nonthermal) exposures. Relatively few chronic, low-level exposure studies of laboratory animals and epidemiological studies of human populations have been reported at the time the letter was written. Since then, there are reports that suggest that potentially adverse health effects, such as cancer, may occur. Since EPS's comments were submitted to the FCC in 1993, the number of studies reporting effects associated with both acute and chronic low-level exposure to RF radiation has increased.

The FCC does not claim that their exposure guidelines provide protection for exposures to which the 4 W/kg SAR basis does not apply, i.e. exposures below the 4W/kg threshold level that are chronic/prolonged and nonthermal. In fact, there have been many studies showing that low level exposure way below the FCC guidelines have detrimental effects. Level of nonthermal RF exposure way below the FCC guidelines have shown to damage the fetal brain, make cells leaky, adversely affect the heart rhythm, damage sperm, break DNA strands and damage DNA, increase glucose in the brain, affect our immune system, cause neurological damage, cause memory loss, etc. In fact, on May 31, 2011, the World Health Organization (WHO) had classified RF as Class 2B Carcinogen, same class as lead, asbestos, engine exhaust, DDT and Agent Orange.

The 4W/kg SAR, a whole-body average, time-average dose-rate, is used to derive dose-rate and exposure limits for situations involving RF radiation exposure of a person' entire body from a relatively remote radiation source. Most people's greatest exposures result from the use of personal communications devices that expose the head. In summary, the current exposure guidelines used by the FCC as based on the effects resulting from whole-body heating, not exposure of and effect on critical organs including the brain and the eyes. In addition, the maximum permitted local SAR limit of 1.6 @/kg for critical organs of the body is related directly to the permitted whole body average SAR ().08 W/kg), with no explanation given other than to limit heating.

Federal health and safety agencies have not yet developed policies concerning possible risk from long-term, nonthermal exposures. When developing exposing standards for other physical agents such as toxic substances, health risk uncertainties, with emphasis given to sensitive populations, are often considered. Young children in school with WiFi, the elderly, the sick are among this group of sensitive populations. And the latest assault is smart meters installed in every single home, schools and even hospitals. Incorporating information on exposure scenarios involving repeated short duration/nonthermal exposures that may continue over very long periods of time (years), with an exposed population that includes children, the elderly, pregnant women and people with various debilitating physical and medical conditions, is necessary in delineating appropriate protective exposure guidelines.

The FCC guidelines are outdated and not adequate to protect any public health and safety and needed to be revised as soon as possible.

Respectfully submitted by

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